

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

**REPAIRIFY, INC.,**  
**a Delaware corporation,**

**Plaintiff,**

**V.**

**KEYSTONE AUTOMOTIVE  
INDUSTRIES, INC.,  
a California corporation  
d/b/a Elitek Vehicle Services, and  
DOES 1 through 20, inclusive,  
Defendants.**

**6:21-cv-00819-ADA**

## JURY TRIAL DEMANDED

**DECLARATION OF CRISTOPHER G. HOLLINGSWORTH IN SUPPORT OF  
PLAINTIFF REPAIRIFY, INC.'S OPPOSITION TO DEFENDANT'S MOTION FOR  
CONTEMPT AND SANCTIONS UNDER FRCP 37(b)(2), OR IN THE ALTERNATIVE,  
SANCTIONS UNDER 37(c) AND/OR THE INHERENT AUTHORITY OF THIS COURT**

I, Cristopher G. Hollingsworth, declare as follows:

1. I am over the age of 18 years and have personal knowledge of the facts set forth herein. If sworn as a witness, I could and would competently testify to the matters set forth herein.

2. I am President of Plaintiff Repairify Global Holdings, Inc. in addition to Repairify, Inc. (“Repairify”), I submit this Declaration in support of Repairify’s Opposition to Defendant’s Motion for Contempt and Sanctions under FRCP 37(b)(2), or in the alternative, Sanctions under FRCP 37(c) and/or the Inherent Authority of this Court. In submitting this declaration it is not Repairify’s intention to waive the attorney-client privilege or any other applicable privilege or protection.

3. Following this Court's September 5, 2023 discovery hearing, Repairify performed a search for documents within the scope of this Court's discovery dispute order, which later issued on September 13, 2023 as Dkt. No. 129. This search included the following:

- I looked to ensure that I did not have any additional summaries of the field study discussed in RPFY010557 (the "Field Study"). I made inquiry and looked to see whether I had an updated version of the Excel spreadsheet that Repairify produced as RPFY010586. I do not have any other summaries of the Field Study.
- I asked Sam Poradish, Repairify's Director, Data Insights and Automotive Intelligence to perform a search for the "five specific use cases" discussed in the document produced with beginning Bates No. RPFY010557. I am informed that these documents were located and produced to Defendant on or about September 18, 2023.
- I asked Jonathan Chatagnier, Repairify's Vice-President of IT to perform a search for summaries of the Field Study. Mr. Chatagnier is familiar with the database in which the data from the field study is stored because his team oversees all of Repairify's IT, data management and security systems. Mr. Chatagnier informed me that he had no knowledge of any further summaries of the field study. I understand the Mr. Chatagnier also searched all of the Repairify global data archives , and did not locate any summaries of the field study.

4. To the best of my knowledge, and in view of the search described above, Repairify does not have possession, custody, or control of any unproduced summaries of the Field Study.

5. I have reviewed the portions of the transcript of my August 28, 2023 which I understand Elitek has cited in support of its contention that I have testified that Repairify possesses unproduced summaries of the field study. I disagree with Elitek's characterizations of my testimony. My testimony that [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] not that Repairify has created "summaries" of the data collected in the Field Study. As I testified, I would and do defer to Jonathan Chatagnier on how that might be

accomplished and what it might entail. As above, I have spoken with Jonathan Chatagnier and confirmed that there are not summaries of the data gathered in the Field Study other than what was included in the document we produced as RPFY010586

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 24th day of October 2023, in Plano, Texas.

Cristopher G  
Hollingsworth

Digitally signed by  
Cristopher G Hollingsworth  
Date: 2023.10.24 16:53:17  
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Cristopher G. Hollingsworth